

United States District Court  
for the  
Southern District of New York  
Related Case Statement

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Full Caption of Later Filed Case:

LIBERTARIAN PARTY OF NEW YORK,  
ANTHONY D ' ORAZIO,  
LARRY SHARPE,  
GREEN PARTY OF NEW YORK,  
GLORIA MATTERA,  
PETER LaVENIA,

Plaintiff

Case Number

vs.

NEW YORK STATE BOARD OF ELECTIONS,  
PETER S. KOSINSKI, as the Co-Chair of the New York State  
Board of Elections; DOUGLAS A. KELLNER, as the Co-Chair of  
the New York State Board of Elections; ANDREW J. SPANO, as a  
Commissioner of the New York State Board of Elections;  
TODD D. VALENTINE, as Co-Executive Director of the New York  
State Board of Elections; and ROBERT A. BREHM, as Co-Executive  
Director of the New York State Board of Elections,

Defendant

Full Caption of Earlier Filed Case:

(including in bankruptcy appeals the relevant adversary proceeding)

SEE APPENDIX

Plaintiff

Case Number

vs.

20-CV-04148-JGK

Defendant

IH-32

Rev: 2014-1

## Status of Earlier Filed Case:

☐

Closed

(If so, set forth the procedure which resulted in closure, e.g., voluntary dismissal, settlement, court decision. Also, state whether there is an appeal pending.)

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Open

(If so, set forth procedural status and summarize any court rulings.)

The complaint has been served and answered and a motion for a preliminary injunction is pending before the Court.

Explain in detail the reasons for your position that the newly filed case is related to the earlier filed case.

This case involves the same issues and the same defendants. Like the plaintiffs herein, the plaintiffs in this case seek to invalidate a New York law that increases ballot access requirements for political parties.

Signature: /s/ Michael Kuzma

Michael Kuzma, Esq.

Date: 7/27/2020

Firm: \_\_\_\_\_

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

LINDA HURLEY and REV. REX STEWART,  
Duly Registered Voters in the State of New York;  
ROBERT JACKSON, RICHARD GOTTFRIED,  
RYUH-LINE NIOU, ANITA THAYER and  
JONATHAN WESTIN, Individually and as Co-  
Chairs of the New York State Committee of the  
Working Families Party and Members of the  
Executive Board of the New York State  
Committee of the Working Families Party; THE  
NEW YORK STATE COMMITTEE OF THE  
WORKING FAMILIES PARTY; THE  
EXECUTIVE BOARD OF THE NEW YORK  
STATE COMMITTEE OF THE WORKING  
FAMILIES PARTY; and THE WORKING  
FAMILIES PARTY OF NEW YORK STATE,

Plaintiffs,

v.

PETER S. KOSINSKI, as the Co-Chair of the New  
York State Board of Elections; DOUGLAS A.  
KELLNER, as the Co-Chair of the New York  
State Board of Elections; ANDREW J. SPANO, as  
a Commissioner of the New York State Board of  
Elections; TODD D. VALENTINE, as Co-  
Executive Director of the New York State Board  
of Elections; and ROBERT A. BREHM, as Co-  
Executive Director of the New York State Board  
of Elections,

Defendants.

Case No. 1:20-cv-

**COMPLAINT**

**INTRODUCTION**

1. On April 3, 2020, Governor Cuomo signed into law an important bill establishing a comprehensive system of public campaign financing for the first time in New York State history. The effort to establish such a system took more than a decade, but the law ultimately codifying the system was passed hastily and without debate as part of a Fiscal YEAR 2021